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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA,) No. CR 11-0811 EMC
15 Plaintiff,)
16 v.)
17 MEDCHEM CORPORATION, and)
HASAN IBRAHIM)
18 Defendants.)
19 _____)

[PROPOSED] ORDER EXCLUDING
TIME FROM NOVEMBER 30, 2011 TO
JANUARY 25, 2012

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21 On November 30, 2011, defendant Hasan Ibrahim appeared with counsel James McNair
22 Thompson before the Honorable Edward M. Chen, United States District Judge, for an initial
23 appearance. Defendant MedChem Corporation was also represented by Mr. Thompson at the
24 appearance. Assistant United States Attorney Peter B. Axelrod appeared for the United States.
25 The matter was continued to January 25, 2012 at 2:30 p.m. before the Court for further status.

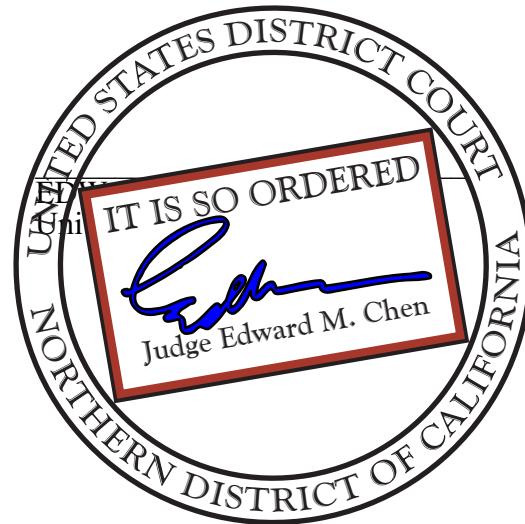
26 At the hearing, the parties agreed that time be excluded between November 30, 2011 and
27 January 25, 2012 under the Speedy Trial Act (18 U.S.C. § 3161) for effective preparation of
28 defense counsel. On November 30, 2011, the United States provided the defense with over

1 25,000 pages of discovery.

2 Based upon the parties' representations and for good cause shown, the Court finds that
3 failing to exclude the time between November 30, 2011 and January 25, 2012 would deny
4 defense counsel the reasonable time necessary for effective preparation, taking into account the
5 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends
6 of justice served by excluding the time between November 30, 2011 and January 25, 2012 from
7 computation under the Speedy Trial Act outweigh the best interests of the public and the
8 defendants in a speedy trial.

9 Therefore, IT IS HEREBY ORDERED that the time between November 30, 2011 and
10 January 25, 2012 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
11 3161(h)(7)(A) and (B)(iv).

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14 DATED: 12/2/11



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